

**POLICY**  
**On PREVENTION**  
**OF SEXUAL HARASSMENT**  
**(POSH POLICY)**  
**OF**  
**GRETEX SHARE BROKING LIMITED**  
**(Formerly known as Gretex Share Broking Private Limited)**

## INTRODUCTION

Gretex Share Broking Limited ("GSBL" or the "Company") is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. GSBL will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

### SCOPE:

The Policy on "Prevention of Sexual Harassment" (POSH Policy) covers every "employee" at GSBL.

Sexual Harassment shall be irrespective of sex, between same sex or opposite sex. Sexual Harassment is judged by the impact on the complainant and not the intent of the Respondent.

## DEFINITIONS

### **Sexual Harassment:**

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

**"Aggrieved Person"** means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

**"Company"** means 'Gretex Share Broking Limited', in short 'GSBL'.

**"Respondent"** means a person against whom the aggrieved person has made a complaint.

**"GSBL Internal Complaints Committee"** (GICC) means a committee constituted by Company as per this policy.

**"Employee"** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

**"Workplace"** "includes all Company premises and shall include any place visited by the employee in the course of employment including transportation provided by the employer for undertaking such journey.

### **Physical conduct**

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or in appropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

### **Verbal conduct**

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)
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### **Non-verbal conduct**

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. **GSBL** recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

**GSBL** recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of **GSBL**, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within **GSBL** premises or outside, including at social events, business trips, training sessions or conferences sponsored by **GSBL**.

#### **GSBL INTERNAL COMPLAINTS COMMITTEE(GICC):**

1. To inquire and advice suitable action on the complaints on Sexual Harassment, there shall be a Committee called as “GSBL Internal Complaints Committee (NICC)”. The Committee shall be constituted by Chairman and Managing Director with the following members:
  - a) A Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case of non-availability of senior level woman employee, the Presiding Officer shall be nominated from administrative units of the work place.
  - b) Not less than two (2) Members of the Board members or Senior Management Personnel (SMP).
  - c) One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total Members so nominated shall be women.

2. Every complaint received shall be forwarded to the NICC for investigation, inquiry.
3. The committee members on need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.

#### **COMPLAINTS PROCEDURES**

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. **GSBL** recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc. When a designated person receives a complaint of sexual harassment, he/she will:

- ❖ immediately record the dates, times and facts of the incident(s)
- ❖ ascertain the views of the victim as to what outcome he/she wants
- ❖ ensure that the victim understands the Company’s procedures for dealing with the complaint
- ❖ discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome

- ❖ keep a confidential record of all discussions
- ❖ respect the choice of the victim
- ❖ ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/ legal framework

Throughout the complaint's procedure, a victim is entitled to be helped by a counsellor within the Company. **GSBL** will nominate a person from senior management and provide him with special training to enable him to assist victims of sexual harassment. **GSBL** recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. **GSBL** understands the need to support victims in making complaints.

### **INFORMAL COMPLAINTS MECHANISM**

If the victim wishes to deal with the matter informally, the designated person will:

- ❖ give an opportunity to the alleged harasser to respond to the complaint
- ❖ ensure that the alleged harasser understands the complaints mechanism
- ❖ facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ❖ ensure that a confidential record is kept of what happens
- ❖ follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
- ❖ ensure that the above is done speedily and within 7 days of the complaint being made

### **FORMAL COMPLAINTS MECHANISM**

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal investigator in accordance with this policy.

The person carrying out the investigation will:

- ❖ interview the victim and the alleged harasser separately
- ❖ interview other relevant third parties separately
- ❖ decide whether or not the incident(s) of sexual harassment took place
- ❖ produce a report detailing the investigations, findings and any recommendations

- ❖ if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.-an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- ❖ follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- ❖ if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- ❖ keep a record of all actions taken
- ❖ ensure that the all records concerning the matter are kept confidential
- ❖ ensure that the process is done as quickly as possible and in any event within 7 days of the complaint being made

## **OUTSIDE COMPLAINTS MECHANISMS**

A person who has been subject to sexual harassment can also make a complaint outside of the Company. They can do so through labour court or judicial court.

## **SANCTIONS AND DISCIPLINARY MEASURES**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

### **Implementation of this policy**

**GSBL** will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, **GSBL** will require all employees to attend a refresher training course on the

content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

## **MONITORING AND EVALUATION**

**GSBL** recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.

## **CONCLUSION:**

1. Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.
2. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.
3. The decision of the Company shall be final and binding on both the person. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

**Note:** Approved in the Board Meeting held on September 05, 2023.